

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Stephen C. Hudson

Plaintiff

v.

University of Puerto Rico

Defendant

Civil Action No.

09 cv 2553 RHK/JSm

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CLERK OF DISTRICT COURT
MINNEAPOLIS, MN

COMPLAINT

- Plaintiff is Stephen C. Hudson located at 8700 Stratford Crossing, Brooklyn Park MN 55443
- Defendant is the University of Puerto Rico, located at Flamboyant St., 1187 South Botanico Garden, San Juan PR 00936.
- Plaintiff is filing action / claim based upon Promissory Estoppel - Plaintiff has been damaged based upon good-faith reliance on Defendant's verbal and written representations.
- In June 2007 Plaintiff met with Defendant's representatives to finalize terms of professional services contract including price. Plaintiff forwarded agreed upon contract to Defendant's representative for execution. Representative informed Plaintiff that the contract signature process would be lengthy due to "State requirements". Parties agreed to begin work while signature process was being completed.

On October 2, 2007 Defendant's representative e-mailed Plaintiff indicating that the contract would be completed by Plaintiff's initial visit (10/22/2007 - 10/26/2007) to begin agreed upon service. On October 3, 2007 Defendant's representative disseminated written communication to key campus constituents indicating intentions to pursue project, the engagement of Plaintiff's services and directing constituents to cooperate with Plaintiff.

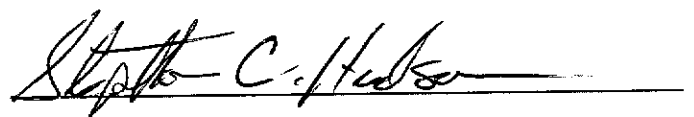
Plaintiff completed work associated with first Phase of contract based on Defendant's promise. To date, Plaintiff has not received executed contract or payment for service rendered.

- Plaintiff request consideration in accordance with the contract value of \$165,000.

Date: 9/18/2009

OCT 03 2009

U.S. DISTRICT COURT MPLS



Stephen C. Hudson
8700 Stratford Crossing
Brooklyn Park, MN 55443